1	J Christopher Jorgensen			
2	Nevada Bar No. 5382 Matthew R. Tsai			
3	Nevada Bar No. 14290 LEWIS ROCA ROTHGERBER CHRISTIE LLP			
4	3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169			
5	Phone: (702) 949-8200 Email: cjorgensen@lrrc.com Email: mtsai@lrra.com			
6	Email: mtsai@lrrc.com			
7	Attorneys for Defendant Synchrony Bank			
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA			
9		DISTRICTOR	NEVADA	
10	DONALD R	R. ROBINSON,	Case No. 2:18-cv-01763-JAD-NJK	
11	Plaintiff,		STIPULATION EXTENDING TIME FOR DEFENDANT SYNCHRONY LENDING, INC. TO RESPOND TO COMPLAINT	
12	vs.			
13	GREAT PLAINS LENDING, LLC, SYNCHRONY LENDING, INC., AND			
14	TRANS UNION LLC,			
15	Defendants.			
16				
17	Plaintiff Donald R. Robinson ("Plaintiff") and Defendant Synchrony Bank, improperly			
18	named as Synchrony Lending, Inc. ("Synchrony") through their respective counsel, hereby			
19	stipulate and agree as set forth below:			
20		RECITALS		
21	A. Plaintiff filed a Complaint ("Complaint") against Synchrony on September 1		aint") against Synchrony on September 11,	
22	2018.			
23	В.	B. Synchrony was served with the Complaint on September 25, 2018.		
24	C.	C. Synchrony's current deadline to respond to the Complaint is October 16, 2018.		
25	D.	D. The parties agreed that Synchrony would have through November 6, 2018 to		
26	respond to the Complaint in order to give Synchrony time to investigate Plaintiffs' claims and			
27	prepare a proper response, and for the parties to discuss a potential resolution of this matter.			
28	E.	There is good cause to grant this sti	pulation because Synchrony requires	

1	additional time to investigate Plaintiffs' claims and prepare a proper response, and the parties		
2	require additional time to consider a resolution of this matter.		
3	F. This stipulation is filed in good faith and not intended to cause delay.		
4	G. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Synchrony		
5	respectfully request that the Court extend Synchrony's time to respond to Plaintiffs'		
6	Complaint through November 6, 2018.		
7	STIPULATION		
8	NOW, THEREFORE, Plaintiff and Synchrony hereby stipulate and agree that		
9	Synchrony has up to and including November 6, 2018, to file a response to Plaintiffs'		
10	Complaint.		
11	IT IS SO STIPULATED.		
12	DATED this 11th day of October, 2018.	DATED this 11th day of October, 2018.	
13	KAZEROUNI LAW GROUP, APC	LEWIS ROCA	
14		ROTHGERBER CHRISTIE LLP	
15	By: /s/ Michael Kind	By: /s/ Matthew Tsai	
16	Michael Kind (NV Bar #13903) 6069 South Fort Apache Rd., Suite 100	J Christopher Jorgensen (NV Bar #5382) Matthew R. Tsai (NV Bar #14290)	
17	Las Vegas, NV 89148 Tel: 800-400-6808 x7	3993 Howard Hughes Parkway, Suite 600 Las Vegas, NV 89169	
18	Email: mkind@kazlg.com	Tel: 702-949-8200 Email: cjorgensen@lrrc.com	
19	Attorney for Plaintiff Donald R. Robinson	Email: mtsai@lrrc.com	
20		Attorneys for Defendant Synchrony Bank	
21			
22	ORDER WEIG GO ORDERER		
23	IT IS SO ORDERED.		
24			
25	United States Magistrate Judge		
26	DATED <u>October 15, 2018</u>		
27			
28			